



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

F. #2019R00102

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 11, 2022

By Email and ECF

The Honorable Raymond J. Dearie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Ricardo Alberto Martinelli Linares and Luis Enrique
Martinelli Linares, Criminal Docket No. 12-65 (RJD)

Dear Judge Dearie:

The government writes in response to the letter filed on April 8, 2022 by the defendants Ricardo Alberto Martinelli Linares and Luis Enrique Martinelli Linares requesting to advance their sentencing dates from May 13, 2022 and May 20, 2022, respectively, to the week of April 25, 2022. For the reasons set forth herein, the government opposes this request.

As the government previously advised the defendants, the government is continuing to gather information relevant to the sentencing hearings, including with respect to (1) the government of Panama's contention that it may be a victim for purposes of restitution in this case,¹ (2) certain allegations made by the defendants (as recently as in an April 8, 2022 letter detailing objections to the PSR for Luis Enrique Martinelli Linares) with respect to their alleged membership in the Central American Parliament ("Parlacen") and (3) the defendants' pre-extradition incarceration in Guatemala. In addition, attorneys for the government are not available the weeks of April 25-29, 2022 or May 2-6, 2022, due to work on other criminal matters, including work that requires international and domestic travel. To the extent that the

¹ While, as the defendants have noted, restitution may be resolved after a sentencing hearing, the government respectfully submits that it would be more efficient to address issues related to sentencing, including restitution, in a single hearing if at all possible.

Court is available, the government would not object to moving the sentencing hearings to earlier in the week of May 9, 2022.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Alixandra Smith
Assistant U.S. Attorney
(718) 254-6370

JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
Criminal Division
Department of Justice

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
Department of Justice

By: /s/
Michael Culhane Harper
Trial Attorney
(202) 616-5224

By: /s/
Michael B. Redmann
Barbara Levy
Trial Attorneys
(202) 436-6891

cc: James G. McGovern, Esq. (by ECF and email)
Sean Hecker, Esq. (by ECF and email)